P2 REGULATORY OPTIONS
for consideration by source work groups as appropriate

These two regulatory P2 options are being forwarded by the CC to the Source Work Groups so that the Work Groups can consider these approaches and can use them to further explore how each may apply to their appropriate source categories and for investigating preliminary regulatory approaches. This document contains framing contextual language as well as an example of how it might be applied for an ICCR source.

1. <u>Waste Accounting and Recordkeeping for P2 Planning</u>:

Description: Facilities would be required to keep records of waste feedstreams, including a description of the waste and its source. These records could then be available to the public and to permit writers. This option has the advantage of enabling pollution prevention to be addressed on a local, site-specific level. It compensates for the lack of detailed routine waste feed data available for ICCR sources.

Application: Any/all non-hazardous solid waste-burning ICCR sources (regulated under § 129).

Measurement: N/A

Example: This provision will provide permit writers with the critical information necessary on waste types, characterization and generation sources to enable them to require or encourage the combustion facility to implement P2. The public will also be able to participate in this activity. The permit writer can thus, if authorized, incorporate P2 provisions into the permit.

A facility burning liquid process wastes in a boiler would characterize and document their feed streams on a regular basis (frequency to be determined by owner/operator). These logs would be available to the public and to the permit writer in one of several ways. Either (1) records could be kept on site; (2) the source itself could make data/reports available; and/or (3) the data could be reported to the local regulatory authority.

The facility could engage in discussions about alternative approaches for managing these waste streams, and either agree to modify their burn stream or to evaluate ways to do so. Specifically, such provisions might include waste stream segregation, waste recovery/recycle, an economic evaluation of alternatives, or a gradual phase down of specified components or toxic constituents in the waste feed. Their permit could incorporate the P2 activities as enforceable conditions.

Pollution Prevention Aspects: This option has the potential to get very meaningful P2 results without unduly burdening facilities with reporting requirements. The option has

many of the attributes the P2 Subgroup desires, including flexibility and accommodation for site-specific conditions. However, it leaves the burden for implementation on the permit writer and public interaction, reducing the certainty or quantifiability of a result. Implementation of this approach can result in source separation, source elimination, recycle or recovery of waste streams.

Possible Limits: N/A

2. Work Practice Standards

Description: This approach would prevent pollution by use of good operating or work practice standards. The approach could require specific handling or separation procedures for materials prior to burning. It may reduce undesirable materials from entering the burn stream, and may improve the combustibility of burned materials. The emission standard would "limit the quantity, rate, or concentration of emissions of air pollutants on a continuous basis, including [any requirement relating to the operation or maintenance of a source to assure continuous emission reduction, and] any design, equipment, work practice or operational standard...." (CAAA Sect. 302)

Application: All waste mixtures subject to contamination.

Measurement: No quantitative measurement would be required. The provision would be stated as a work practice standard, and compliance would be determined based on whether or not it is implemented.

Example: (1) For a subcategory where "low" moisture or debris content of a fuel/waste reduces emissions, a requirement could be established to appropriately store or cover the fuel/waste. (2) In the case where heterogeneous wastes are commonly burned, site waste separation practices could be established.

Pollution Prevention Aspects: This approach has the potential to improve combustion efficiency (e.g., by keeping materials dry) and to keep HAP-laden contaminants out of burners.

Possible Limits: N/A